

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ROBYN FENTY and TOURIHANNA LLC,

Plaintiffs,

-against-

BERDON, LLP, MICHAEL MITNICK, and
PETER GOUNIS,

Defendants.

Case No. 12-cv-5207 (PKC)

STIPULATION

WHEREAS, the Court entered an Order dated March 14, 2013 adjudicating certain open discovery disputes between the parties (the "Order");

WHEREAS, on March 29, 2013, the Court "so ordered" a Stipulation between the parties revising, in part, the schedule set forth in the Order.

WHEREAS, the parties continued to confer on the remaining deadlines set forth in the Order, have stipulated to the following, and respectfully request the Order be amended as follows:

1. Plaintiff Robin Fenty will be produced for her second day of deposition, not to exceed five (5) hours, on May 8, 2013, at the offices of Wilson Elser Moskowitz Edelman & Dicker LLP in Los Angeles.
2. The deposition of Jay Brown, pursuant to his subpoena dated January 4, 2013, shall take place on May 9, 2013, at the offices of Wilson Elser Moskowitz Edelman & Dicker LLP in Los Angeles.
3. All other deadlines set forth in the Order shall remain in effect, but the parties agree to continue to confer on any remaining items in the Order in an attempt to reach a final schedule for production of all documents by Plaintiffs and Defendants and completion of all depositions. This Stipulation shall not constitute a waiver of either party's right to make an application to further extend or modify the deadlines set forth in the Order.

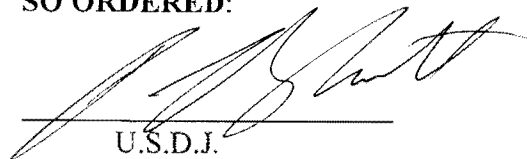
Dated: New York, New York
April 4, 2013

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SO ORDERED:



U.S.D.J.

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